

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
VIRGINIA DIXON ET AL., Plaintiffs, v. ETHICON, INC., ET AL.	Case No. 2:12-cv-01081

NOTICE OF VIDEO DEPOSITION OF DENNIS DIXON

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that the undersigned attorneys for defendants Ethicon, Inc. and Johnson & Johnson, pursuant to FED. R. CIV. P. 30 and the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, will take the deposition upon oral examination of the following person on the date, at the time and at the place set forth below:

Deponent

Dennis Dixon

Location

Feldstein Grinberg Lang
& McKee, P.C.
428 Blvd. of the Allies
Suite 600
Pittsburgh, Pa 15219

Date

November 3, 2015

Time

9:00am

PLEASE TAKE FURTHER NOTICE that said deposition shall be videotaped and shall take place before a duly qualified Notary Public authorized to administer oaths and shall continue from day to

day until completed. Said deposition shall cover all matters relevant to the subject matter of the within action.

PLEASE TAKE FURTHER NOTICE that the person to be examined is required to produce any document reviewed by the deponent, prior to the commencement of the deposition, to prepare for the deposition and/or to refresh the deponent's recollection regarding the facts of this case, as well as all documents requested on Schedule A.

PLEASE TAKE FURTHER NOTICE that a copy of Pretrial Order No. 38, "Deposition Protocol," is attached for the deponent's review.

Dated: October 7, 2015

Respectfully submitted,

/s/ *Melissa A. Graff*

COUNSEL FOR DEFENDANTS
ETHICON, INC. AND
JOHNSON & JOHNSON

SCHEDULE A

The deponent shall bring to the deposition the following documents that are in his/her possession, control or custody:

1. Documents you reviewed to prepare and complete the Plaintiff s Profile Form.
2. Documents you reviewed to prepare and complete the Plaintiff s Fact Sheet.
3. To the extent not previously produced, all documents identified in Section VII of the Plaintiff Fact Sheet.
4. To the extent not previously produced, all documents identified in Section VIII of the Plaintiff Fact Sheet.
5. To the extent not previously produced, all documents in your possession, control or custody concerning the Pelvic Mesh Product at issue for the treatment of stress urinary incontinence and/or pelvic organ prolapse.
6. All documents that you have reviewed prior to your deposition concerning the Pelvic Mesh Product at issue for the treatment of stress urinary incontinence and/or pelvic organ prolapse, including, without limitation, patient brochures, IFUs, DVDs and FDA Health Notifications.

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2015, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/s/ Melissa A. Graff